## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

LA VON SCHMOLL, Individually and as Special Administrator for the Estate of CYRIL C. SCHMOLL, Deceased,	)	
Plaintiff,	)	
V.	)	
OWENS-ILLINOIS, INC.,	)	Case No. 3:98-cv-00693-wmc
Defendant.	)	(E.D. Pa. Case No. 09-CV-61026-ER)
GARY SUOJA, Individually and as Special Administrator for the Estate of OSWALD F. SUOJA, Deceased,	)	
Plaintiff, v.	))))	
OWENS-ILLINOIS, INC.,	)	Case No. 3:99-cv-00475-bbc
Defendant.	)	(E.D. Pa. Case No. 09-CV-60256-ER)
BARBARA CONNELL, Individually and as Special Administrator for the Estate of DANIEL CONNELL, Deceased,	)	
Plaintiff,	)	
V.	)	
OWENS-ILLINOIS, INC.,	)	Case No. 3:05-cv-00219-bbc
Defendant.	)	(E.D. Pa. Case No. 09-CV-60552

## PARTIES' JOINT PROPOSED SCHEDULING ORDER

Plaintiffs and Owens-Illinois, Inc. ("Owens-Illinois") submit this joint proposed plan on post-remand coordinated pretrial proceedings pursuant to the telephonic status conferences and Order of April 30, 2014.

- 1. Supplementation of Rule 26(a)(2)(B) expert reports, if any, due September 19, 2014.
- 2. Depositions of 26(a)(2)(B) expert witnesses to be completed by December 19, 2014. These depositions are limited in scope to the supplemental matter in the expert reports.
- 3. Daubert motions are due January 8, 2015. Plaintiff's position is that all Daubert motions must be non-dispositive.
  - 4. Responses to Daubert motions are due February 20, 2015.
  - 5. Replies in support of Daubert motions, if any, are due March 6, 2015.

Dated: May 9, 2014	Respectfully submitted,
/s/ Robert G. McCoy Michael P. Cascino Robert G. McCoy Jin-Ho Chung	/s/Brian O. Watson  Matthew J. Fischer  Edward Casmere  Brian O. Watson
Cascino Vaughan Law Offices, Ltd. 220 S. Ashland Avenue	Schiff Hardin LLP 233 S. Wacker Drive Suite 6600
Chicago, Illinois 60607 Phone: (312) 944-0600	Chicago, Illinois 60606 Phone: (312) 258-5500
Fax: (312) 944-1870	Fax: (312) 258-5600
Attorneys for Plaintiffs	Attorneys for Defendant Owens-Illinois, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on May 9, 2014, these papers were filed with the Clerk of the Court for the United States District Court for the Western District of Wisconsin using the CM/ECF system, which will send notification of such filing upon all parties who have appeared.

/s/ Jin-Ho Chung	